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BEFORE THE ARIZONA CORPORATION COMMISSION

In the Matter of )

Petition of Q LINK WIRELESS LLC )  
for Designation as an Eligible Telecommunications )  
Carrier in the State of Arizona On A Wireless Basis )  
(Low Income Only) )

Docket No. T-20824A-11-0446

Arizona Corporation Commission

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**FIRST AMENDMENT TO PETITION OF Q LINK WIRELESS LLC  
FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE STATE OF ARIZONA ON A WIRELESS BASIS (LOW INCOME ONLY)**

**I. INTRODUCTION**

Q LINK WIRELESS LLC ("Q LINK" or the "Company"), by its undersigned counsel, and pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act")<sup>1</sup> and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"),<sup>2</sup> and the rules and regulations of the Arizona Corporation Commission ("Commission"), hereby submits this Amendment to its Petition for Designation as an Eligible Telecommunications Carrier ("ETC") in the State of Arizona which was filed on December 13, 2011. Q LINK amends its request for ETC designation solely for participation in the Lifeline program; the Company does not seek ETC designation for purposes of participating in the Link-Up program. Q LINK meets all statutory and regulatory requirements for designation as an ETC in the State of Arizona, including the new requirements outlined in the FCC's *Lifeline and Link*

<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

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*Up Reform Order.*<sup>3</sup>

## II. COMPANY FACILITIES

Q LINK, in its provision of wireless services, will rely on a combination of Company-owned facilities and resold services which the Company will obtain from underlying wireless providers that currently operate their own networks. Q LINK's facilities provide the Company the ability to route operator service calls, customer service calls and directory assistance calls, as well as minutes of use for local service provided at no additional charge to end-users, which satisfies the FCC's definition for supported services.<sup>4</sup> Q LINK's updated facilities schematic is attached hereto as Exhibit 2.

FCC Rule 54.201(d) states that a common carrier using a combination of its own facilities and resale of another carrier's services shall be eligible to receive universal service support. In affirming its own decisions, the FCC chose to continue to define the term "own facilities" as "*any physical components* of the telecommunications network that are used in the transmission of the services that are designated for support"<sup>5</sup> (emphasis added). Therefore, Q LINK meets the FCC's test that requires an ETC to provide services, at least in part, through a combination of its own facilities and resale of another carrier's services.<sup>6</sup>

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<sup>3</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) ("*Lifeline and Link Up Reform Order*").

<sup>4</sup> *See In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal Service Reform – Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, (rel. Nov. 18, 2011) ("*USF/ICC Transformation Order*"), para. 78; *see also* Revised Section 47 C.F.R. § 54.101(a) (redefining supported services).

<sup>5</sup> *See* 47 C.F.R. § 54.101; 47 C.F.R. § 54.201(e).

<sup>6</sup> *See* 47 U.S.C. § 214(e)(1)(A).



### III. CONCLUSION

Rapid grant of the Company's request would advance the public interest because it would enable the Company to commence much-needed Lifeline services to low-income Arizona residents as soon as possible. Accordingly, the Company respectfully requests that the Commission expeditiously approve its application, as amended, for ETC designation.

Respectfully Submitted,

By:



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*Attorneys for Q LINK WIRELESS LLC*

February 9, 2012



**TABLE OF EXHIBITS**

Exhibit

Certification of Issa Asad, Managing Member of QUADRANT HOLDINGS  
GROUP LLC, Managing Member of Q LINK WIRELESS LLC..... 1

Confidential Facilities Schematic ..... 2



**EXHIBIT 1**

**Certification of Issa Asad, Managing Member of QUADRANT HOLDINGS GROUP LLC,  
Managing Member of Q LINK WIRELESS LLC**



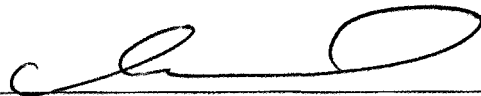
State of Florida  
County of Broward

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### Certification

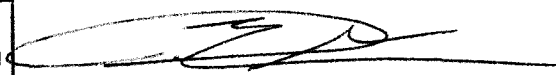
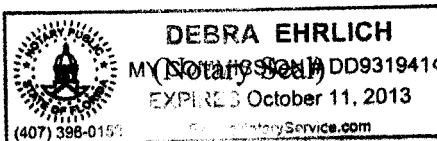
Personally appeared before the undersigned, an officer duly authorized to administer oaths, Issa Asad, who first being duly sworn, deposes and states that he is the Managing Member of QUADRANT HOLDINGS GROUP LLC, Managing Member of Q LINK WIRELESS LLC of Q LINK WIRELESS LLC, Applicant in this Application, and has read the same and knows the contents thereof, and confirms that the statements made herein are true to the best of his knowledge and belief.

Dated: 2/2/2012



Issa Asad  
Managing Member of QUADRANT HOLDINGS GROUP LLC,  
Managing Member of Q LINK WIRELESS LLC

Subscribed and sworn to before me this 2 day of February, 2012.



(Signature of person authorized to administer oath)

My Commission Expires: October 11, 2013

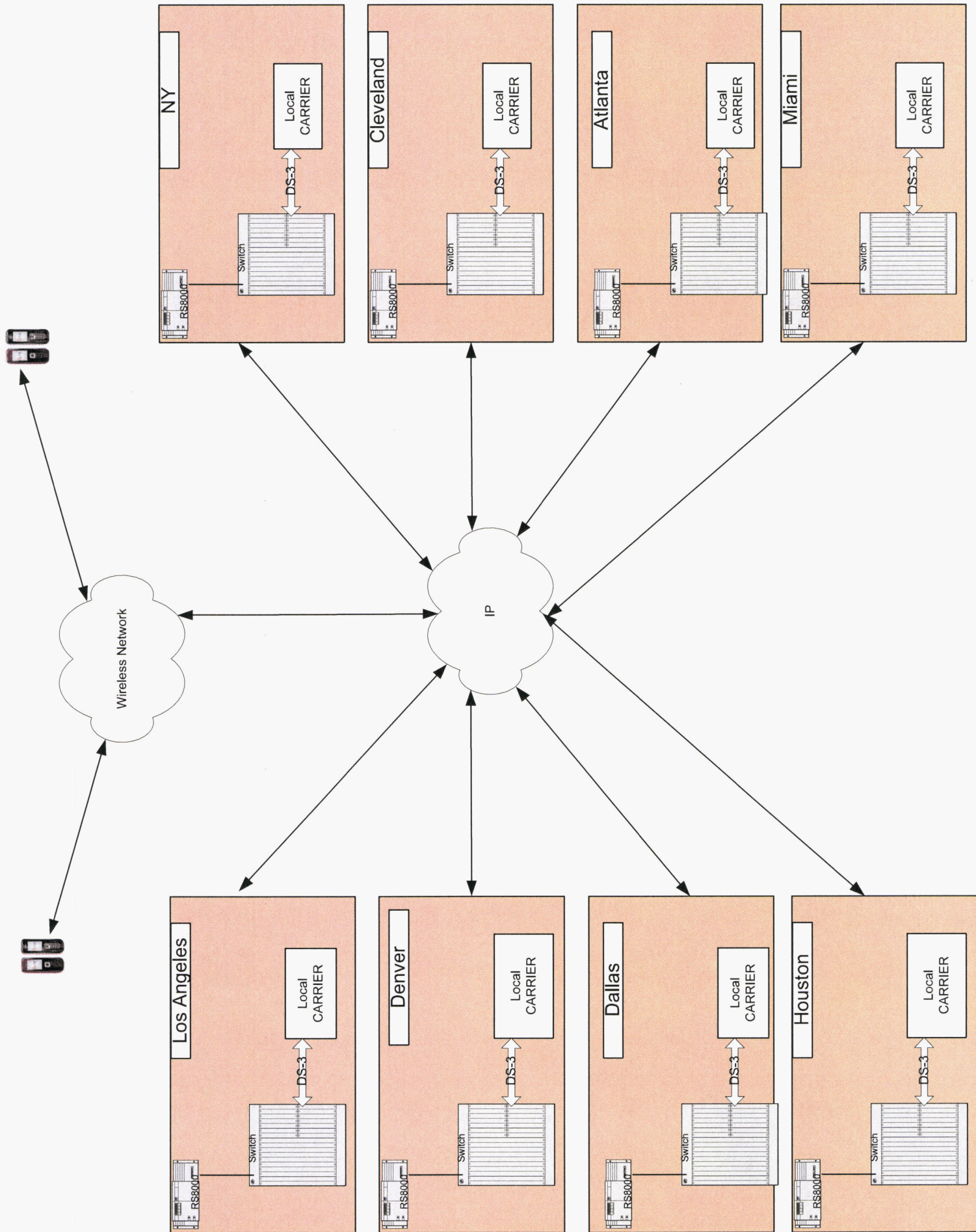


**EXHIBIT 2**

**Confidential Facilities Schematic**

**PROPRIETARY INFORMATION**







QLINK WIRELESS- Local footprint

